

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 23-22599

XYZ CORPORATION,

Plaintiff,

v.

The Individuals, Partnerships and Unincorporated  
Associations Identified on Schedule A,

Defendant/Counterclaimant.

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**MOTION FOR EXTENSION OF TIME TO RESPOND TO AMENDED COMPLAINT**

Defendants, jiahao guo, EEIRLJQD, Yue Tan, ZhangLeheng, ZhangLing, BHHLNVMF, WPOCCBW, DJMATRER, Jiangchao, Pangwei, and DCKDIO (collectively “Defendants”), by and through undersigned counsel, hereby file this Motion for Extension of Time until October 25, 2023, to respond to Plaintiff’s Complaint, and, in support thereof, states as follows:

1. Defendants’ response to Plaintiff’s Amended Complaint is due October 6, 2023.
2. Plaintiff and Defendants are in the middle of engaging in good faith settlement discussions. Defendants seek to appropriate its resources toward finding resolution if it may prevent unnecessary fees and costs associated with responding to Plaintiff’s Complaint.
3. Good cause for the requested relief exists, because without an extension of time, Defendants will be expending resources on litigating the matter in great detail despite being in the middle of discussing a potential resolution relating to Plaintiff’s claims.
4. This motion is brought in good faith and is not being filed for the purpose of delay, or due to any lack of diligence on Defendants’ behalf during the previously set response period.
5. The filing of this motion will not prejudice Plaintiff.

6. This is the first motion for an extension filed by Defendants in this case.

7. Counsel for Defendants has met and conferred with Plaintiff's counsel regarding the relief sought via this motion. Plaintiff's counsel does not oppose the relief sought via this motion.

WHEREFORE, for good cause shown, Defendants request that the Court grant this Motion and allow Defendants up to and including October 25, 2023, to file a response to Plaintiff's Complaint.

**L.R. 7.1(a)(3) Certification**

Counsel for Defendants has met and conferred with all parties who may be affected by the relief sought hereunder (*i.e.*, Plaintiff), and Plaintiff has indicated that it does not oppose the relief sought herein:

October 5, 2023

Respectfully submitted.

**HEITNER LEGAL, P.L.L.C**

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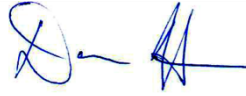
DARREN A. HEITNER

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2023, a true and correct copy of the foregoing was electronically filed using CM/ECF, which serves electronic notice on all counsel of record and registered CM/ECF users.

By:   
DARREN A. HEITNER